1 2 3 4	JACK E. BUCHANAN, ESQ. Nevada Bar No. 11069 BUCHANAN DEFENSE LAW 300 S. Maryland Parkway Las Vegas, NV 89101 702-382-9103 Jack@BDLNV.com	
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6	IN THE UNITED STATES DISTRICT COURT	
7	FOR THE DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	Case No. 2:22-CR-00018-APG-VCF
9	Plaintiff,	
10	-VS-	UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCE INVESTIGATION REPORT & PROPOSED ORDER
11	JEREMY FRANCOM,	
12	Defendant.	
13		
14	COMES NOW, JEREMY FRANCOM, by and through his attorney of record, JACK E.	
15	BUCHANAN, ESQ., and hereby moves this Honorable Court to order the United States Department	
16		
17	of Parole & Probation to conduct a pre-plea presentence investigation report of JEREMY FRANCOM	
18	as soon as possible.	
19	This request is based upon the pleadings and papers on file herein, the attached Memorandum	
20	of Points and Authorities, and any oral argument the Court may entertain.	
21	DATED this 25 th day of May, 2022.	
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23		
24		_/s/ Jack Buchanan
25		JACK E. BUCHANAN, ESQ.
26	300 S. Maryland Parkway Las Vegas, NV 89101	
27		Attorney for Defendant, FRANCOM
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MEMORANDUM OF POINTS AND AUTHORITIES

I. STATEMENT OF FACTS

On January 25, 2022, a Federal Grand Jury returned an Indictment charging the Defendant, Jeremy Francom with seven counts of Interference with Commerce by Robbery, in violation of U.S.C. § 1951(a) and two counts of Bank Robbery, in violation of 18 U.S.C. § 2113(a). Trial is currently scheduled for August 22, 2022.

II. LEGAL ARGUMENT

A presentence investigation may be initiated prior to entry of a guilty plea or nolo contendere or prior to the establishment of guilt. *See generally* Fed. R. Crim. P. 32. Counsel requires a pre-plea presentence investigation report to determine whether Mr. Francom will fall into a certain criminal history category that could significantly affect his position within the sentencing guidelines. Counsel understands that Mr. Francom has prior felony convictions, however, counsel cannot accurately calculate whether Mr. Francom's convictions could be used and calculated against him, as some of them are very close to more than 15 years old. Moreover, a number of his previous sentencing were imposed on the same day, run concurrently, and in some cases, Mr. Francom had probation grants and subsequent revocation of probation proceedings that could affect the calculation of the time with which these previous convictions could be used against him. Mr. Francom's position within the criminal history category will drastically impact his sentencing exposure, potential negotiations, and his decision as to how he should proceed in this matter. A pre-plea presentence investigation report will promote judicial economy and could greatly expedite the manner in which this case is resolved. Furthermore, Mr. Francom consents to the pre-plea presentence investigation.

Counsel has spoken to the Government and they do not oppose the instant motion.

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Therefore, undersigned counsel respectfully requests this Court issue an Order directing the United States Department of Parole & Probation to conduct a pre-plea presentence investigation report of Mr. Francom as soon as possible. III. CONCLUSION Based on the foregoing, Defendant asks this Court to grant his Motion to Conduct a Pre-Plea Presentence Investigation Report. Defendant further requests this Court order the United States Department of Parole & Probation to conduct a pre-plea presentence investigation report of Mr. Francom as soon as possible. Dated this 25th day of May, 2022. /s/ Jack Buchanan_ JACK E. BUCHANAN, ESQ. 300 S. Maryland Parkway Las Vegas, NV 89101 Attorney for Defendant, FRANCOM **ORDER** IT IS ORDERED that the United States Department of Parole and Probation will prepare a Pre-Plea Presentence Investigation Report on Defendant, JEREMY FRANCOM within 90 days. IT IS SO ORDERED THE HONORABLE ANDREW P. GORDON UNITED STATES DISTRICT COURT JUDGE DATED: May 26, 2022